

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

REC SOFTWARE USA, INC.,

Plaintiff,

v.

HTC AMERICA, INC., a Washington
corporation et al.,

Defendants.

Lead Case No. 2:14-CV-1025 MJP

[Consolidated with Non-Lead Case Nos.
2:14-CV-1048-MJP; 2:14-CV-1050-MJP;
2:14-CV-1053-MJP; 2:14-CV-1056-MJP;
2:14-CV-1059-MJP; 2:14-CV-1060-MJP

**DEFENDANTS' REPLY IN SUPPORT OF
DEFENDANTS' MOTION TO STRIKE
PLAINTIFF REC SOFTWARE USA,
INC'S INFRINGEMENT CONTENTIONS**

**NOTE ON MOTION CALENDAR:
FEBRUARY 6, 2015**

*Reply in Support of Defendants' Motion to Strike
(2:14-cv-01025-MJP)*

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1 **I. INTRODUCTION**

2 From the outset of this proceeding, Plaintiff REC Software USA Inc.'s ("REC's")
3 infringement case has been fraught with legal errors and factual misstatements. After REC
4 served its Infringement Contentions ("ICs"), Defendants immediately brought numerous
5 deficiencies in REC's theories to its attention. Those deficiencies include improper
6 allegations as to joint infringement, boilerplate allegations of infringement by the doctrine of
7 equivalents, and improper assertions of infringement of a method claim based on the sale,
8 offer to sell, making, and importing of mobile devices. After Defendants made several
9 attempts to have REC correct these deficiencies, REC withdrew its allegations as to joint
10 infringement and infringement by the doctrine of equivalents. Dkt. # 72 - 4 [REC's
11 Withdrawal and Clarification] in case no. 2:14-cv-1025 MJP (the "Lead Case"). REC
12 persisted with its improper allegations that Defendants infringed method claims by acts other
13 than the use of the claimed method, even after Defendants provided a number of Federal
14 Circuit cases to the contrary. Finally, after forcing Defendants to bring a Motion to Strike,
15 REC withdrew those allegations. Defendants understand that REC's infringement allegations
16 are now limited to instances where Defendants themselves allegedly used the accused devices
17 in the United States in a manner that practiced the claimed method.

18 While REC has finally remedied some of the errors in its ICs, the contentions are still
19 deficient under the Local Patent Rules for their lack of specificity. The Court should strike
20 the remainder of REC's ICs.

1 **II. ARGUMENT**

2 **A. The Court Should Strike REC's ICs for Failing to Provide a Claim Chart for**
 3 **Each Accused Device.**

4 As stated in Defendants' Motion, REC fails to provide "a chart identifying specifically
 5 where each element of each Asserted Claim is found *within each Accused Device*" as required
 6 by Local Patent Rule 120(c) (emphasis added). While REC alleges that Appendix A to its ICs
 7 provides an "element-by-element infringement analysis," Appendix A is deficient under the
 8 law because it does not demonstrate where each element is found *in each accused mobile*
 9 *device* as required by the Local Patent Rules. Appendix A fails to even mention a single
 10 device by name or model number. Because REC has prejudiced the Defendants' ability to
 11 fully prepare their defenses by failing to provide an infringement theory specific to each
 12 accused device, the Court should strike its ICs.

15 The Court should strike Appendix C to the ICs as well because REC has not explained
 16 in its ICs or in its opposition to Defendants' Motion to Strike how any portion of the
 17 1.3 million pages (many of which cannot even be opened by standard software tools) relate to
 18 its infringement theories or demonstrate how any portion of Appendix C relates to any
 19 specific accused device. Instead, REC merely explains in its Opposition that "[t]he default
 20 Android Operating System, including the Dalvik VM, for version of the Android system is
 21 provided in Appendix C produced herewith." Dkt. # 77 in the Lead Case [REC's Opp'n] at
 22 5:8-9. This does not explain how any portion of Appendix C supports REC's contention that
 23 each limitation of each asserted claim is found in any accused product. Because of this
 24 failure, Appendix C does not meet the requirements of the local rules.

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B. REC's ICs Fail to Explain How Any Pre-Installed Application Satisfies Each Claim Element as Required by Local Patent Rule 120(c).

REC has never explained, either in its ICs or in its Opposition, how any specific preinstalled application on any accused mobile device actually practices each of the limitations of the asserted method claims. In its ICs, REC alleges that “certain pre-installed applications” running on the accused mobile devices using the Android operating system infringe the patent. Dkt. # 72-1 in the Lead Case [Kropp Decl.], at App. A, p. 1. Then, in documents referenced in Appendix B to each set of Infringement Contentions, REC lists pre-installed applications that allegedly practice the claimed method but fails to provide any explanation as to how any of these applications might satisfy a single claim limitation. *Id.*, at App. B & Dkt. #72-6 in the Lead Case. Across all of the ICs served in these cases, REC lists literally hundreds of pre-installed applications without any explanation as to how any of them allegedly infringe. For example, REC suggests that the Amazon MP3 app found on the Dell Streak 7 (WiFi Only) mobile device allegedly practices the claimed method. Dkt. 72-6 in the Lead Case at REC_DEL_Strk7NoC_0000007. But nowhere in the ICs does REC explain how or in what manner use of the Amazon MP3 app satisfies each claim limitation. This omission fails to comply with LPR 120(c) and prejudices the Defendants’ ability to prepare their defenses.

In its Opposition, REC asserts that “the claimed ‘second multi-module program’ is the program that the operating system is attempting to load or ‘map’ or run, whereas the first program is comprised of components of the operating system itself (including portions of the Dalvik VM) that are working to load or ‘map’ and run the second multi-module program.” Dkt. # 77 in the Lead Case at 6:26-7:3. However, this description is nothing more than a

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generic functional description that mimics certain claim language. REC fails to identify where or how the required “second multi-module program” is found in each pre-installed application or how each program is loaded, mapped, and run on the accused products. This description leaves Defendants to guess how, when, or where the use of any specific pre-installed application infringes, and what components in each pre-installed application REC contends is/are the second multi-module program(s). REC fails to link any specific pre-installed application to the infringement contentions, and there is no basis to open discovery into potentially hundreds of non-party app developers.

Finally, REC’s ICs remain deficient because REC attempts to portray its list of accused mobile devices, pre-installed applications, and versions of the Android operating system as merely exemplary. *See* Dkt. # 72-1 in the Lead Case [REC’s Infringement Contentions], at App. A, p. 2. REC ignores this deficiency in its Opposition. Providing mere examples of applications, mobile devices, and operating systems violates Local Patent Rule 120(b), and REC should not be permitted to expand its list of allegedly infringing devices, pre-installed applications, or versions of the Android operating system.

C. REC’s Generic Allegations Against 32 Versions of Android Should Be Stricken.

REC’s Opposition does not contest that its ICs include 10 versions of Android that were released *after* the ’936 Patent expired in August 2011. This is improper. It is well settled that there can be no infringement for any product or technology released after a patent has expired. *See Kearns v. Chrysler Corp.*, 32 F.3d 1541, 1550 (Fed. Cir. 1994) (“Because the rights flowing from a patent exist only for the term of the patent, there can be no infringement once the patent expires.”). As a result, REC’s infringement allegations as to

1 Android versions 2.2.3, 2.3.6, 2.3.7, 3.2.1, 3.2.2, 3.2.4, 4.0, 4.0.1, 4.0.2, and 4.0.3 should be
2 stricken.

3 As to the remaining versions of Android, REC fails to explain its basis for contending
4 the accused functionality operates in the same manner across all versions of Android and all
5 Accused Products. REC suggests it has “directly address[ed]” this issue by citing three
6 paragraphs from its Appendix A. Dkt. 77 [REC’s Opp’n] in the Lead Case at 7:10-21.
7 However, in each of these three paragraphs, REC fails to provide any basis beyond attorney
8 argument for its contention that the accused functionalities operate in the same manner across
9 different versions of Android. Indeed, REC admits that it has not reviewed many versions of
10 the Android operating system, suggesting REC may not have performed an adequate pre-
11 filing investigation.
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14 REC’s reliance on *Implicit Networks Inc. v. Hewlett-Packard Co.*, No. C 10-03746 SI,
15 2011 WL 3954809 (N.D. Cal. Sept. 7, 2011) is misplaced. In *Implicit Networks*, the patent
16 holder provided, in addition to claim charts, “a narrative explanation of how [each] product
17 group infringes[,] support[ing] the narrative with citations to HP manuals and other HP
18 documentation for specific products within that group,” and the narratives were “specific for
19 each element of each claim and for each category of HP product.” *Id.* at *2-3. In this case,
20 REC has not provided any basis for grouping all accused products for all defendants together.
21 Despite the public availability of Android source code, the code for many Defendants’
22 accused devices, and documentation concerning the operation of Android, REC’s ICs do not
23 cite or rely on any of it to support its contention that the accused functionalities operate in the
24 same manner across the different versions of Android.
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1 Finally, REC's off-tangent attack on Defendants' Noninfringement contentions are of
2 no moment as those contentions are not the subject of this motion. REC's allegations are also
3 incorrect because the Defendants' contentions meet the requirements of the rule, not only
4 enumerating the multiple deficiencies in REC's infringement contentions but also identifying
5 the *exact areas* where we disagree with REC.
6

7 **III. CONCLUSION**

8 For the reasons set forth above and in the Defendants' Motion to Strike Plaintiff REC
9 Software USA, Inc.'s Infringement Contentions, the Court should strike the remaining
10 Infringement Contentions that REC has not already stricken.
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